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Attorneys for Defendant Aramark Correctional Services, LLC

[Other parties and counsel on signature page]

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

ARMIDA RUELAS; DE'ANDRE EUGENE
COX; BERT DAVIS; KATRISH JONES;
JOSEPH MEBRAHTU; DAHRYL
REYNOLDS; MONICA MASON; LUIS
NUNEZ-ROMERO; and all others similarly
situated,

Plaintiffs,

v.

COUNTY OF ALAMEDA; GREGORY J.
AHERN, SHERIFF; ARAMARK
CORRECTIONAL SERVICES, LLC; and
DOES 1 through 10,

Defendants.

Civil Case No.: 4:19-CV-07637 JST

**JOINT STIPULATION AND
[PROPOSED] ORDER TO CONTINUE
APRIL 28, 2020 INITIAL CASE
MANAGEMENT CONFERENCE TO
JULY 21, 2020**

1 Pursuant to Civil L.R. 6-1(b), 6-2, and 7-12, plaintiffs Armida Ruelas, De'Andre Eugene Cox,
2 Bert Davis, Katrish Jones, Joseph Mebrahtu, Dahryl Reynolds, Monica Mason, Luis Nunez-Romero,
3 defendants County of Alameda and Sheriff Gregory J. Ahern (collectively, the "County Defendants"),
4 and defendant Aramark Correctional Services, LLC ("Aramark") respectfully submit this joint
5 stipulation to continue the Initial Case Management Conference ("CMC") now scheduled for April 28,
6 2020 to July 21, 2020 at 2 p.m.

7 WHEREAS, on November 20, 2019, plaintiffs filed their Complaint (*see* Dkt. No. 1);

8 WHEREAS, on November 22, 2019, the Court issued an order setting an initial CMC for
9 February 25, 2020, along with related deadlines (*see* Dkt. No. 5);

10 WHEREAS, on February 6, 2020, the Court granted the parties' stipulated request to continue
11 the initial CMC from February 25, 2020 to April 28, 2020 (*see* Dkt. No. 34);

12 WHEREAS, the County Defendants and Aramark filed motions to dismiss the Complaint (*see*
13 Dkt. Nos. 13, 23), which the Court has taken under submission but not yet decided (*see* Dkt. Nos. 36,
14 37);

15 WHEREAS, the Court's decisions on defendants' motions to dismiss may affect the scope of
16 plaintiffs' case and discovery;

17 WHEREAS, in connection with the COVID-19 pandemic, the Court has indicated that it will
18 grant stipulated requests to continue case management conferences scheduled before May 1, provided
19 that the requested continuance is for not more than 90 days;

20 WHEREAS, continuing the initial CMC to permit the Court time to consider defendants'
21 motions will promote efficiency and conserve judicial resources and will provide necessary time for the
22 parties and their counsel to coordinate and prepare appropriately for the CMC and the antecedent
23 activities tethered to the CMC, which activities are not currently practicable under existing conditions;

24 WHEREAS, this stipulation is made without prejudice to the parties requesting a further
25 continuance of the initial CMC for good cause shown;

26 WHEREAS, the parties propose to continue the initial CMC now set for April 28, 2020 to July
27 21, 2020 at 2 p.m., and to continue related deadlines that are tethered to the date of that CMC; and
28

WHEREAS, the requested continuance is for less than 90 days.

NOW, THEREFORE, THE PARTIES BY COUNSEL HEREBY STIPULATE as follows:

1. The initial CMC shall be continued to July 21, 2020 at 2 p.m.

2. The parties' Rule 26(f) Report and Case Management Statement pursuant to Federal Rule of Civil Procedure 26(f) and Civil Local Rule 16-9 shall be filed, and initial disclosures shall be completed or objections otherwise stated in the Rule 26(f) Report, on or before July 14, 2020.

3. The parties shall meet and confer pursuant to Federal Rule of Civil Procedure 26(f) and Alternative Dispute Resolution Local Rule 3-5 on or before June 30, 2020.

4. The parties shall file the ADR Certification pursuant to Civil Local Rule 16-8(b) and Alternative Dispute Resolution Local Rule 3-5(b) on or before June 30, 2020.

DATED: March 31, 2020

COVINGTON & BURLING LLP

By: /s/ Cortlin H. Lannin

Cortlin H. Lannin

Attorneys for Defendant

Aramark Correctional Services, LLC

DATED: March 31, 2020

SIEGEL, YEE, BRUNNER & MEHTA

By: /s/ EmilyRose Johns

EmilyRose Johns

Attorneys for Plaintiffs

DATED: March 31, 2020

SKANE WILCOX LLP

By: /s/ Joel Glaser

Joel Glaser

Attorneys for Defendants

*County of Alameda and Gregory J. Ahern,
Sheriff*

**PURSUANT TO STIPULATION, AND FOR GOOD CAUSE SHOWN, THE COURT
ORDERS AS FOLLOWS:**

1. The CMC now set for April 28, 2020 shall be continued to July 21, 2020 at 2 p.m.
2. The parties' Case Management Statement pursuant to Federal Rule of Civil Procedure 26(f) and Civil Local Rule 16-9 shall be filed on or before July 14, 2020.
3. The parties shall meet and confer pursuant to Federal Rule of Civil Procedure 26(f) and Alternative Dispute Resolution Local Rule 3-5 on or before June 30, 2020.
4. The parties shall file the ADR Certification pursuant to Civil Local Rule 16-8(b) and Alternative Dispute Resolution Local Rule 3-5(b) on or before June 30, 2020.

DATED: _____

THE HONORABLE JON S. TIGAR
UNITED STATES DISTRICT JUDGE

ATTESTATION

I, Cortlin Lannin, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: March 31, 2020

By: /s/ Cortlin H. Lannin
Cortlin H. Lannin